

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

THE STATE OF MISSOURI, ex rel. )  
ANDREW BAILEY, in his official )  
capacity as Missouri Attorney General, )

Plaintiff, )

vs. )

Case No. 4:24-cv-00955-AGF

INTERNAL REVENUE SERVICE, )

Defendant. )

**CASE MANAGEMENT ORDER – TRACK 3: COMPLEX**


Pursuant to the Civil Justice Reform Act Expense and Delay Reduction Plan and the Differentiated Case Management Program of the United States District Court of the Eastern District of Missouri, and the Rule 16 Conference held on **September 25, 2024**,

**IT IS HEREBY ORDERED** that the following schedule shall apply in this case, and will be modified only upon a showing of exceptional circumstances:

1. This case has been assigned to Track 3 (Complex).
2. All motions for amendment of pleadings shall be filed no later than **November 27, 2024**.
3. The parties shall file periodic status reports beginning on **November 25, 2024**, and continuing every **60 days** thereafter, which shall advise the Court of the status of the release of records and the status of the parties' efforts to narrow the contested issues in this case.
4. Any motions for summary judgment or motions for judgment on the pleadings must be filed no later than **September 19, 2025**. Responses shall be filed no later than **28 days** after the motion is filed (and no later than **October 17, 2025**) and any reply may be filed no later than **14 days** thereafter (and no later than **October 31, 2025**).

5. In the event this case is not resolved by summary judgment, the parties shall meet and confer and file, within **14 days** of the Court's denial of summary judgment, a joint scheduling plan for the remainder of this litigation, including a proposed trial setting and the expected length of trial.

Failure to comply with any part of this order may result in the imposition of sanctions.

  
\_\_\_\_\_  
AUDREY G. FLEISSIG  
UNITED STATES DISTRICT JUDGE

Dated this 25th day of September, 2025.